

Ex. 1

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

LISA DOMSKI,

Plaintiff,

Case No. 2:23-cv-12023

v.

Hon. David M. Lawson

BLUE CROSS BLUE SHIELD
OF MICHIGAN,

Mag. Elizabeth A. Stafford

Defendant.

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**DECLARATION OF KATE BOVERHOF
PURSUANT TO 28 U.S.C. § 1746**

1. I, Kate Boverhof, am over the age of eighteen and am competent to attest to the facts set forth in this declaration.

2. I am a former employee of the Defendant in this matter, Blue Cross Blue Shield of Michigan (“Defendant”).

3. I was employed as a member of Defendant’s Talent Acquisition Team in Defendant’s Human Resources Department.

4. I possess knowledge regarding Defendant’s religious and medical accommodation process for job candidates and current employees subject to the Company’s mandatory COVID-19 vaccination policy.

5. I recorded the video that the Plaintiff in this matter, Lisa Domski, included as her trial Exhibit No. 47.

6. Pursuant to my job duties, I was present at the October 12, 2021 meeting organized by Patricia Snyder and Bart Feinbaum for the purpose of informing Talent Acquisition, a team that I was a part of, about the religious and medical accommodation process for Defendant’s COVID-19 vaccination policy.

7. The meeting was scheduled to discuss the religious and medical accommodation process for job candidates who were offered employment positions by Defendant.

8. The religious accommodation process for job candidates was the same as for current employees.

9. During the meeting, the Labor and Relations team discussed rationale for approving or denying religious accommodation requests.

10. I attest with certainty that the candidate accommodation process and employee accommodation process followed the same guidelines, which included submitting a written request for a religious or medical accommodation and being interviewed by Defendant's accommodation personnel teams for an interrogation about the request.

11. I attest with certainty that the candidate accommodation process was the dry run for the employee accommodation process. Meaning, Defendant adopted the same rationale to the employee accommodation process.

12. I attest with certainty that Ms. Snyder is the individual that can be heard on the recording stating: "I want to be very realistic with his group to say we're not going to accept all religious accommodation requests. We might not accept all medical accommodation requests."

13. I attest with certainty that Mr. Feinbaum is the individual that can be heard on the recording stating: "I've done some research on this and I would say the major religious and I'm saying three major religions Christianity, Judaism, Islam all in general say that vaccinations are allowable under their religious teachings."

14. I attest with certainty that Mr. Feinbaum is the individual that can be heard on the recording stating: "each of these interviews are going to be like mini depositions and I've done hundreds of those."

15. I attest with certainty that Mr. Feinbaum is the individual that can be heard on the recording laughing about the religious and medical accommodation procedure and stating that the process would be “fun.”

16. I attest with certainty that Mr. Feinbaum is the individual that can be heard on the recording stating: “I would say that if they decide to get the vaccine, then we have accomplished our goal to get them vaccinated.”

17. It is my understanding that Mr. Feinbaum will be called as a witness at Plaintiff’s trial.

18. It is my understanding that Ms. Snyder will be called as a witness I declare under penalty of perjury under the laws of the United States of America and the State of Michigan that the foregoing is true and correct.

Executed on: 10 / 30 / 2024



Kate Boverhof



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